

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

<div>STEVEN SKLAR,</div> <div>Plaintiff,</div> <div>v.</div> <div>BANK OF AMERICA CORP., et al.,</div> <div>Defendants.</div>	<div>No. 09 Civ. 580 (DC)</div>
AND RELATED CASES	
THIS PLEADING RELATES TO: <b>DERIVATIVE ACTIONS</b>	

**JOINT MOTION BY LOUISIANA MUNICIPAL  
POLICE EMPLOYEES RETIREMENT SYSTEM AND  
HOLLYWOOD POLICE OFFICERS' RETIREMENT SYSTEM TO  
CONSOLIDATE DERIVATIVE ACTIONS, APPOINT LEAD PLAINTIFFS,  
AND APPROVE PROPOSED LEAD PLAINTIFFS' CHOICE OF COUNSEL**

PLEASE TAKE NOTICE that, upon the Declaration of Albert M. Myers, executed March 20, 2009, the exhibits attached thereto, the accompanying Memorandum of Law, and all pleadings heretofore filed in this action and in the derivative actions identified in the Memorandum of Law, the Louisiana Municipal Police Employees Retirement System ("Louisiana") and the Hollywood Police Officers' Retirement System ("Hollywood") (collectively, the "Institutional Group") will move this Court, at a time to be determined by the Court, for an order consolidating all similar shareholder derivative actions currently pending against the officers and directors of Bank of America

Corporation (“BAC” or the “Company”) and other defendants, to appoint Louisiana and Hollywood as Lead Plaintiffs, and to appoint Kahn Gauthier Swick, LLC and Saxena White P.A. as Co-Lead Counsel.<sup>1</sup>

Dated: March 23, 2009

Respectfully submitted,

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<sup>1</sup> The Institutional Group also has the support of plaintiff Steven Waldman in *Waldman v. Lewis, et al.*, No. 09 Civ. 834, which is among the derivative actions sought to be consolidated.

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